

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ABRAHAM SAHO,

Plaintiff,

v.

NATIONAL CREDIT SYSTEMS,
INC.,

Defendant.

Case No.:

NOTICE OF REMOVAL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant NATIONAL CREDIT SYSTEMS, INC., (hereinafter, “NCS”) (incorrectly named in the complaint as National Credit System and Management) and hereby removes the above-entitled action originally filed in the Civil Division of Fulton County, Georgia, then transferred to the Superior Court for Fulton County, Georgia. NCS removes this matter to the United States District Court for the Northern District of Georgia, Atlanta Division pursuant to 28 U.S.C. §§ 1331, 1367, 1441 and 1446 without waiver of any defenses.

1. On or about May 01, 2023, NCS was served with a copy of the Amended Complaint filed by Plaintiff ABRAHAM SAHO (“Plaintiff”) in the

Superior Court of Fulton County Georgia, action entitled *ABRAHAM SAHO v. NATIONAL CREDIT SYSTEM AND MANAGEMENT (sic)*, filed in the State of Georgia, Superior Court of Fulton County, Case No. 2023CV376078. A true and correct copy of Plaintiff's Amended Complaint ("the State Court Action") is attached hereto as Exhibit A.

2. The Amended Complaint indicates that it was filed on May 01, 2023. (See Exhibit A).¹

3. Pursuant to 28 U.S.C. § 1331, this Court has jurisdiction over the State Court Action because it raises federal questions. Specifically, Plaintiff alleges that NCS has violated the Fair Credit Reporting Act (the "FCRA"), 15 U.S.C. § 1681 *et seq.* (Exhibit A, ¶ 10).

4. As required by 28 U.S.C. § 1446(b), this Notice of Removal is properly filed within thirty (30) days of the service of the Plaintiff's Complaint.

5. Venue is proper pursuant to 28 U.S.C. § 1446(a) because Fulton County is in the Northern District of Georgia.

¹ Plaintiff initially filed suit in state court on November 14, 2022. *See* Exhibit B: Initial Complaint. However, the Initial Complaint specifically stated that Plaintiff brought claims pursuant to state law, which is a material change from the Amended Complaint which alleges violations of federal law.

6. NCS will promptly file a copy of this Notice of Removal with the Clerk of the Superior Court of Fulton County, Georgia, and a copy of this Notice of Removal is being concurrently served upon the Plaintiff.

7. As such, Removal of the State Court Action is therefore proper under 28 U.S.C. §§ 1331, 1367, 1441 and 1446.

Dated: May 31, 2023

Respectfully submitted,

/s/ Natalie Green Hosea

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CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 5.1

Undersigned counsel hereby certifies that this document has been prepared with Times New Roman 14-point font as approved by LR 5.1(B).

/s/ Natalie Green Hosea

Attorney for Defendant

National Credit Systems, Inc.

CERTIFICATE OF SERVICE

This is to certify that I have, on this day, caused a copy of the Notice of Removal to be served upon all parties of record.

Dated: May 31, 2023.

/s/ Natalie Green Hosea

Attorney for Defendant

National Credit Systems, Inc.